

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
THIS DOCUMENT RELATES TO: ETHICON WAVE 10 CASES LISTED IN EXHIBIT A	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

ETHICON DEFENDANTS' NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSES OF REBECCA M. RYDER, M.D. FOR WAVE 10

Plaintiffs filed a Notice of Adoption in the Wave 10 cases identified in Exhibit A to their Notice, adopting their Motion to Exclude Certain Opinions and Testimony of Rebecca M. Ryder, M.D. *See* Doc. 7998. In response, Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general causation opinions of Dr. Ryder for Wave 1 (Doc. 2154), as well as their response to Plaintiffs' motion to Exclude the Opinions of Dr. Rebecca M. Ryder in *Mullins v. Ethicon, Inc.*, Doc. 1244, Case No. 2:12-cv-2952, as their response for Wave 10. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the prior response briefing.

Defendants acknowledge that on August 25, 2016, the Court issued a Memorandum Opinion and Order, Doc. 2653 (the "Order") granting Plaintiffs' Wave 1 Motion in part, denying it in part, and reserving judgment in part. Where the Court denied Plaintiffs' Wave 1 Motion, Defendants respectfully request that the Court adopt the same ruling in the Wave 10 Cases for the reasons set forth in Defendants' Wave 1 Response and the Court's Order.

Where the Court otherwise granted or reserved judgment on Plaintiffs' Wave 1 Motion, Defendants acknowledge the Court's ruling but preserve their right to challenge the ruling on appeal.

Respectfully submitted,

/s/ William M. Gage
William M. Gage (MS Bar No. 8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
wiliam.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar No. 5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage